

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission)	
On Its Own Motion)	
)	
Establishment of rules regarding service)	
quality and customer protection applicable)	ICC Docket No. 06-0468
to wireless carriers operating as eligible)	
telecommunications carriers.)	

INITIAL BRIEF OF
THE PEOPLE OF THE STATE OF ILLINOIS

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Initial Brief of the People of the State of Illinois

I.	Introduction	3
II.	Background on Universal and ETC Designation	4
III.	The Proposed Rules Are Competitively Neutral and Properly Hold Wire line and Wireless ETCs to Similar Standards, With Adjustments Based On Differences in Service and Technology	6
IV.	The Commission Should Reject Sprint Nextel’s Claim that Illinois Should Limit Consumer Protection and Service Quality Standards to the CTIA Code	8
V.	Consumer Protections are Not Rate Regulations nor Regulation of Entry of Mobile Services Into the Market and Constitute Regulation of “Other Terms and Conditions” Pursuant to 47 U.S.C. §332(c)(3)	10
VI.	The Commission Should Reject Sprint Nextel’s Argument That There is No Balance Between Cost of Compliance With Consumer Protection Standards and Cost to Wireless Carriers	13
VII.	The Commission Should Reject Sprint Nextel’s Argument that Competition in the Wireless Industry is Sufficient to Protect Consumers.....	15
VIII.	Conclusion	17

The People of the State of Illinois, by Lisa Madigan, Attorney General, submit the following Initial Brief in support of the Part 736¹ Rules proposed in this docket:

I. INTRODUCTION

On June 7, 2006, the Commission initiated a proceeding to develop and adopt rules regarding service quality and customer protection applicable to wireless carriers who receive universal service support subsidies. These carriers, known as wireless Eligible Telecommunications Carriers (“wireless ETCs” or “WETCs”), receive payments from both the federal and the state universal service funds to extend telecommunications services to under-served areas. Carriers must obtain approval from state public utility commissions such as the ICC in order to receive these subsidies.

Staff witness Sam McClerren proposed rules in his Direct and Reply Testimony. Staff Ex. 1.0, Attachment 1; Staff Ex. 2.0, Attachment 1. Part 736 includes both service quality and consumer protection provisions, incorporating and modifying portions of Part 730 (service quality) and Part 735 (consumer protection) where appropriate to reflect the characteristics of wireless service that differ from wireline service.

One party offered testimony critical of the rules, while the Staff and William Flesch on behalf of the Illinois Independent Telephone Association supported the rules. The People of the State of Illinois, although not filing testimony, support the rules proposed by Staff and recommend their adoption. The one witness opposing the rules, Lilli Taylor for Sprint Nextel Corporation, maintained that state requirements should be limited to provisions of the Cellular Telecommunications and Internet Association’s

¹ Although the Staff initially designated the rules under Part 733, in Reply Testimony Staff witness Samuel McClerren pointed out that Part 733 was already dedicated to another subject, and re-designated the rules under Part 736. Staff. Ex. 2.0 at 13.

Consumer Code for Wireless Service, a voluntary code. Sprint Nextel Ex. 1.0 at 4; Staff Ex. 2.0 at 5. Ms. Taylor stated that the Sprint Nextel attorneys may present legal arguments regarding the Commission's authority to propose rules that regulate entry or rates under 47 U.S.C. § 332(c)(3). Sprint Nextel Ex. 1.0 at 16.

The proposed Part 736 rules should be adopted, and, as demonstrated below, are well within the Commission's authority.

II. Background on Universal Service and ETC Designation

The Communications Act of 1934, as amended by the Telecommunications Act of 1996, mandates that national policy reflect "the preservation and advancement of universal service." 47 U.S.C. §254(b). The universal service principles and goals adopted by Congress include:

"Quality services should be available at just, reasonable, and affordable rates." 47 U.S.C. §254(b)(1).

"Consumers in all regions of the Nation, including low-income consumers and those in rural, insular, and high cost areas, should have access to telecommunications and information services, ... that are reasonably comparable to those services provided in urban areas and that are available at rates that are reasonably comparable to rates charged for similar services in urban areas." 47 U.S.C. §254(b)(3).

"There should be specific, predictable and sufficient Federal and State mechanisms to preserve and advance universal service." 47 U.S.C. §254(b)(5).

Congress further authorized the Federal Communications Commission (FCC) to adopt “[s]uch other principles as the Joint Board and the Commission determine are necessary and appropriate for the protection of the public interest, convenience, and necessity and are consistent with this chapter.” 47 U.S.C. §254(b)(7). To meet these goals, Congress established the Universal Service Fund, to which telecommunications carriers contribute, often by passing the charge to consumers. 47 U.S.C. §254(d); WW Holding Co., Inc. v. Sopkin, ___ F.3d ___, 2007 WL 1600389, P. 7 (10th Cir., June 5, 2007) (attached).

Telecommunications carriers, including wireless telephone companies, must obtain certification to be eligible to receive public subsidies from the universal service fund. 47 U.S.C. §214(e). The state commission is responsible for designating a carrier as an ETC for specific areas in the state, “consistent with the public interest, convenience, and necessity.” 47 U.S.C. §214(e)(2).

State commissions may “impose, on a competitively neutral basis and consistent with section 254 of this title, requirements necessary to preserve and advance universal service, protect the public safety and welfare, ensure the continued quality of telecommunications services, and safeguard the rights of consumers.” 47 U.S.C. §253(b). Although state commissions may not generally regulate the entry or the rates of wireless or mobile service carriers,² federal law “shall not prohibit a State from regulating the other terms and conditions of commercial mobile services.” 47 U.S.C. §332(c)(3)(A). As the Court in WW Holding Co., Inc. v. Sopkin, supra, 2007 WL 1600389, P. 7, emphasized:

² Federal law provides that wireless or commercial mobile rate “where such services are a substitute for land line telephone exchange service for a substantial portion of the communications within such State,” are not exempt “from requirements imposed by a State Commission on all providers of telecommunications services necessary to ensure the universal availability of telecommunications services at affordable rates.” 47 U.S.C. 332(c)(3)(A).

Congress envisioned that state commissions could regulate mobile services for “such matters as customer billing information and practices and billing disputes and other consumer protection matters; facilities siting issues (e.g., zoning); transfers of control; the bundling of services and equipment; and the requirement that carriers make capacity available on a wholesale basis or such other matters as fall within a state's lawful authority. This list is intended to be illustrative only and not meant to preclude other matters generally understood to fall under ‘terms and conditions.’” *Citing* H. Rpt. No. 103-111, at 260 (1993), *reprinted in* 1993 U.S.C.C.A.N. 378, at 588.^{FN7} [FN7. For example, the Eleventh Circuit recently held that a state requirement regarding the use of line items in customer billing was properly within a state's Section 332 authority over the “other terms and conditions” of mobile services. *Nat'l Ass'n of State Util. Consumer Advocates v. FCC*, 457 F.3d 1238, 1242 (11th Cir.2006).]

The WW Holding Court held that the Colorado public utilities commission was not precluded from imposing conditions on applicants for wireless ETC status. WW Holding Co., *supra*, 2007 WL 1600389, page 14 (see fn 3, page 16 for contested conditions).

The rules proposed in this docket on service quality and consumer protection standards are consistent with federal law's delegation of authority to set competitively neutral rules “to preserve and advance universal service, protect the public safety and welfare, ensure the continued quality of telecommunications services, and safeguard the rights of consumers,” 47 U.S.C. § 253(b). Further, the rules proposed do not affect entry or rates, but rather, again consistent with federal law, set only the “terms and conditions” of wireless ETC telephone service. See 47 U.S.C. §332(c)(3).

III. The Proposed Rules Are Competitively Neutral and Properly Hold Wire line and Wireless ETCs to Similar Standards, With Adjustments Based On Differences in Service and Technology.

The FCC recognizes that states may adopt rules “to ensure that supported services are offered in a manner that protects consumers.” In re Fed.-State Joint Bd. on Universal

Serv., 20 F.C.C. Rcd. 6371, ¶30 (Mar. 17, 2005) (“2005 FCC Universal Service Order”).

Congress intended that state commissions evaluate local factual situations in making ETC designations and that they exercise discretion in reaching their conclusions regarding the public interest, convenience and necessity. 47 U.S.C. § 214(e)(2). State commissions are most familiar with the service area for which ETC designation is sought and are particularly well-equipped to determine state ETC requirements. 2005 FCC Universal Service Order, ¶ 61. The Telecommunications Act plainly contemplates a partnership between the federal and state governments to support universal service. Qwest Corp. v. FCC, 258 F.3d 1191, 1203 (10th Cir. 2001). Thus, “it is appropriate- even necessary-- for the public to rely on state action in this area.” Id.

State rules must be imposed “on a competitively neutral basis.” 2005 FCC Universal Service Order, ¶ 31; 47 U.S.C. §253(b). Although the FCC has noted that “parity for parity sake” is not necessary, the FCC recognized that wireless carriers that seek federal universal service funds and ETC status may be subject to local wire line telephone rules, adjusted to reflect the differences between wireless and wire line technology and services. 2005 Universal Service Order, ¶ 30. In this docket, the rules applicable to wire line carriers (ILECs, CLECs, and ETCs) were modified to accommodate the differences between wireless and wire line technology and service, while appropriately assuring all consumers a consistent level of service quality and consumer protection. See Staff Ex. 1.0 at 10-36 (specifying the differences between the proposed rules and existing rules). The need to maintain a consistent level of service protects consumers while maintaining competitive neutrality between wire line and wireless carriers. IITA Ex. 1.0 at 8-9.

The Part 736 Rules recommended in this docket should be adopted by the Commission. The FCC recognized that a carrier seeking ETC status must “demonstrate its commitment to meeting consumer protection and service quality standards” and “make a specific commitment to objective measures to protect consumers.” 2005 FCC Universal Service Order at ¶28. Clearly federal law authorizes such rules, and the need to maintain competitive neutrality dictates that wireless ETCs conform to rules that are essentially the same as those that apply to wire line carriers (ETC and non-ETC alike). These standards insure that consumers who select a wireless carrier for local service receive a level of service that is reasonably comparable to that of other, wire line local telephone service.

IV. The Commission Should Reject Sprint Nextel’s Claim that Illinois Should Limit Consumer Protection and Service Quality Standards to the CTIA Code.

In the 2005 FCC Universal Service Order the FCC said that in its consideration of ETC applications, it would accept a commitment to comply with the CTIA Code to demonstrate commitment to consumer protection and service quality. 2005 FCC Universal Service Order at ¶ 28. In doing so, the FCC stated that states that grant ETC status “may either follow the Commission’s framework or impose other requirements consistent with federal law to ensure that supported services are offered in a manner that protects consumers.” Id. at ¶30. In WW Holding Co., Inc. v. Sopkin, ___ F.3d ___, 2007 WL 1600389, P. 7 (10th Cir., June 5, 2007), the Court expressly held that the Telecommunications Act permits states to impose eligibility requirements on carriers seeking an ETC designation in addition to FCC requirements.

Sprint Nextel witness Taylor claims that the CTIA Code provides enough consumer protections for wireless consumers in ETC areas. Sprint Nextel Ex. 1.0 at 6. However, the CTIA does not contain the specificity necessary to assure consistent service quality and consumer protections. Staff witness McClerren testified that the CTIA Code offers inadequate protection for Illinois wireless consumers seeking to rely upon wireless service for their local service in previously underserved areas. Staff Exhibit 2.0 at 11. For example, the CTIA Code map obligations identify approximate voice service coverage, whereas the map requirement of Part 736 is designed to identify where the wireless carrier is seeking ETC funding. The map obligations of Part 736 serve a different purpose than the CTIA maps and are not duplicative of the CTIA Code. Id. at 8.

In regard to customer billing, the CTIA Code does not address, as Part 736 does, the following items:³ monthly billing requirements, delivery method of bills, unbilled service restrictions, refunds, or electronic billing and payment. Id.; §736.610. The CTIA Code also fails to address Part 736's customer service obligations and dispute procedures which include: customer service representative answering times (§736.505); failure to install service, service interruption, and trouble reports notification. (§§ 736.520, 736.525 & 736.530); and dispute resolution and procedures (§736.695); and appeal options, including review by the ICC (§736.700). Id. at 10. Other provisions that are not included in the CTIA Code but are vital to consumers in areas where the choice of carriers is limited are deferred payment agreements (§736.620), discontinuance or refusal of service provisions (§736.660), illness provision (§736.670), and past due billing procedures (§736.685). The need to ensure service is available and provided on terms

³ Citations are from Attachment 1 to Staff Ex. 2.0, and reflect the renumbering necessary to conform to JCAR requirements.

that are comparable to wire line service mandate that the rules proposed by Staff be adopted.

The CTIA Code is a voluntary agreement by carriers to provide certain consumer protections, which primarily relate to advertising and marketing. Sprint Nextel Ex. 1.0, Attachment at 1 & Sections 1-5. These protections are incorporated in Section 736.500, but are not sufficient to provide consumers the protections they receive when they use wire line telephone service. When a carrier accepts public money to serve an area that cannot be served economically without subsidies, it is appropriate to impose consumer protections applicable to other carriers who face little if any competition. Although the proposed Part 736 adopts many of the service quality and consumer protections applicable to wire line telephone service, many modifications were made to accommodate the specific conditions presented by wireless service. See, e.g., Staff Ex. 1.0 at 11-12, 14 (reporting), 17 (emergency operations), 19 (call data requirements), 23 (service outages, replaced by dropped call reporting). These modifications demonstrate that the wire line rules are not being blindly applied to wireless carriers.

The CTIA Code is a good starting point, and its protections are included in the proposed Part 736 rules. However, the proposed rules properly include additional measures of protection for consumers that should be adopted.

V. Consumer Protections are Not Rate Regulations nor Regulation of Entry of Mobile Services Into the Market and Constitute Regulation of “Other Terms and Conditions” Pursuant to 47 U.S.C. §332(c)(3).

The FCC requires a carrier seeking ETC designation to demonstrate its commitment to meeting consumer protection and service quality standards in its

application before the Commission. 2005 FCC Universal Service Order at ¶28. States may extend generally applicable, competitively neutral requirements that do not regulate rates or entry and that are consistent with sections 214 and 254 of the Act to all ETCs in order to preserve and advance universal service. Id. at ¶ 31.

Pursuant to 47 U.S.C. §332(c)(3)(A) “no State or local government shall have any authority to regulate the *entry of or the rates* charged by any commercial mobile service, except that this paragraph shall not prohibit a State from regulating the *other terms and conditions* of commercial mobile services.” (Emphasis added). A straightforward reading of the complementary phrases “regulate entry of or the rates charged” and “other terms and conditions,” 47 U.S.C. §332(c)(3)(A), evidences the “clear and manifest purpose of Congress” to leave the regulation of consumer protection and service quality standards to the states. Cliff v. Payco General American Credits, Inc., 363 F.3d 1113, 1122 (11th Cir. 2004).

A “rate,” as defined by the Oxford English Dictionary, is “[t]he amount of a charge or payment...having relation to some other amount or basis of calculation.” Oxford English Dictionary (2d ed. 1989). Other dictionaries define a “rate” as “[a]n amount paid or charged for a good or service,” Black’s Law Dictionary 1268 (7th ed. 1999). “In the absence of an indication to the contrary, words in a statute are assumed to bear their ‘ordinary, contemporary, common meaning.’” Pioneer Inv. Servs. Co. v. Brunswick Assocs. Ltd P’ship, 507 U.S. 380, 388 (1993). The FCC has stated that “rate” is defined in the dictionary as an “amount of payment or charge based on some other amount.” National Association of State Utility Consumer Advocates v. FCC, 457 F.3d

1238, 1253 (11th Cir. 2006), citing Sw. Bell Mobile Sys., Inc., 14 F.C.C.R. at 19,901 ¶ 19 (1999); cert. petition filed, 75 USLW 3483 (Feb. 27, 2007, No. 06-1184).

The FCC has applied the distinction between “rates” and “other terms and conditions” to interpret whether a regulation amounts to rate regulation under §332(c)(3)(A). The Commission for example, has upheld state regulation that requires wireless service providers to contribute to the state-wide universal service fund as an “other term or condition.” Pittencrieff, 13 F.C.C.R at 1742 ¶¶ 42-43. The Commission in Pittencrieff expressly rejected the argument that the obligation of a universal service fee was rate regulation because “it impacts the rates that a [wireless service] provider charges its customers.” Id. at 1745 ¶ 20. If the imposition of a universal service charge (which consumers must pay) does not “set rates,” but rather falls within the meaning of “other terms and conditions,” then requiring compliance with consumer protection and service quality standards clearly sets “terms and conditions” and has an even more attenuated relationship with rates.

In National Association of State Utility Consumer Advocates, the 11th circuit determined the state rules requiring or prohibiting the use of line items in customer billing for wireless service are not regulation of rates under §332(c)(3)(A). National Association of State Utility Consumer Advocates v. FCC, supra, 457 F.3d at 1258. This is consistent with the rulings of several other federal courts that have determined that state efforts to combat consumer fraud and other practices injurious to consumers are not “rate regulation.” They are not preempted by federal law, provided they do not ensnare the states in a determination of the reasonableness of the rates charged. See Id.; Fedor v. Cingular Wireless Corp., 355 F.3d 1069, 1073-74 (7th Cir. 2004); State ex rel. Nixon v.

Nextel West Corp., 248 F.Supp.2 885, 892 (E.D. Mo. 2003) (state law is not preempted where the claim involves contract terms because the court need not inquire into the reasonableness of the charges). This is consistent with the House Committee Report regarding section 332(c)(3)(A), which explained that “other terms and conditions” of wireless service, which are regulated by the states, “include such matters as customer billing information and practices and billing disputes and other consumer protection matters.” H.R. Rep. No. 103-111, at 211 (1993). The legislative history of the Act shows that Congress intended to leave the authority to regulate wireless consumer protection standards with the states even in the absence of an ETC designation.

This Commission has the authority to adopt the proposed rules under both section 332 (47 U.S.C. §332(c)(3)), which authorizes states to enact rules governing the “terms and conditions” of wireless service, and sections 253 and 254 (47 U.S.C. § 253, 254), the universal service rules granting states the right to establish rules to promote the goals of universal service.

VI. The Commission Should Reject Sprint Nextel’s Argument About the Balance Between the Cost of Compliance With Consumer Protection Standards and the Cost to Wireless Carriers.

In preparing the rules proposed in this docket, efforts were made to recognize conditions specific to wireless carriers so that the regulatory burden on those carriers was appropriate to the services offered and the technology used. E.g., Staff Ex. 1.0 at 4-5. However, Sprint Nextel witness Taylor argued that the proposed rule does not strike an appropriate balance between encouraging wireless carriers to obtain federal funds and the costs of complying with the rule. Sprint Nextel Exhibit 1.0, at 4. She did not testify to

the specific cost of implementing any specific section of the rule, nor did she indicate how much Sprint Nextel would derive from USF if Sprint Nextel did decide to seek ETC designation in Illinois. Rather, as Staff witness McClerren pointed out, Sprint Nextel's position requires the Commission to simply accept her unsupported contention that it will cost too much to implement the proposed Part 736 relative to the financial gain Sprint Nextel could receive by accepting public subsidies from the Universal Service Fund. ICC Staff Exhibit 2.0 at p. 6.

Sprint Nextel also claims that if these rules are adopted, it is unlikely that additional wireless carriers will seek to be designated as ETCs in Illinois. Sprint Nextel Exhibit 1.0, p. 4. Three wireless carriers that have sought ETC funding in Illinois have indicated a willingness to comply with Part 736. Illinois Valley Cellular (IVC) has obtained ETC status,⁴ and U.S. Cellular⁵ and Cellular Properties⁶ have indicated their commitment to comply with the final rules that result from this ETC rulemaking proceeding.

In rejecting a petition by wireless carriers to be exempt from the rules applicable to ETCs, the Iowa Utilities Board addressed the question of balancing the regulatory burdens associated with ETC status against the costs. The Iowa Utilities Board stated:

“As the Board has previously indicated, the application for ETC status is a voluntary exercise by the carrier. By choosing to apply for and receive ETC status, a provider, including a wireless provider, submits to certain specific regulatory obligations. If a wireless carrier weighs the pros and cons and decided that the benefit of the federal USF subsidy outweighs the regulatory obligations, it will make the decision to apply for ETC status. The voluntary nature of ETC certification and weighing of the benefits and obligations that accompany the public subsidy and designation gives [sic] the Board the appropriate jurisdiction

⁴ Order, ICC Docket 04-0454-0455-0456 (Consol)(April 19, 2006).

⁵ ICC Docket 04-0653.

⁶ ICC Docket 07-0154.

over complaints against ETC-certified carriers concerning unauthorized changes in service.”

In re Eligibility, Certification, and Reporting Requirements for Eligible Telecommunications Carriers, Iowa Department of Commerce, Utilities Board, Docket No. RMU-06-01, Order at 4 (Nov. 20, 2006), available at:
http://www.state.ia.us/government/com/util/docs/orders/2006/1120_rmu061.pdf

Even if Sprint Nextel finds Illinois’s rules inconsistent with its national practices, and declines to seek universal service subsidies in Illinois, other regional and local wireless companies that are not burdened with nationwide concerns will still have the opportunity to seek ETC designation and serve rural and underserved areas. In addition, Sprint Nextel will remain free to offer service anywhere in the state without public subsidies. IITA witness William E. Flesch, representing the small wire line companies, correctly calls Sprint Nextel’s comments a “scare tactic” that the Commission should ignore. IITA Exhibit 1.0, p. 9. Sprint Nextel’s “threat” not to seek ETC funding is a threat which the Commission need not take seriously.

VII. The Commission Should Reject Sprint Nextel’s Argument that Competition in the Wireless Industry is Sufficient to Protect Consumers.

Sprint Nextel witness Taylor argues that service quality and consumer protection rules for wireless ETCs are unnecessary because there are at least three wireless carriers serving 98% of the population. Sprint Nextel Ex. 1.0 at 5. This argument raises several questions. First, if an area is served by several carriers, it would confer an unwarranted competitive advantage for any one carrier to receive federal subsidies. One would expect that no carrier would qualify for universal service funding under those circumstances.

Second, as Staff witness McClerren pointed out, there may be places where part of a county is served by more than one carrier, but other portions of the county are not served at all. Staff. Ex. 2.0 at 4. The need to be aware of what service is available in a specific area is one reason state commissions review ETC designations. Further, in those areas where service is not possible without ETC funding, consumers are unlikely to have any choice among mobile carriers. Under those circumstances, consumers can rightly expect that the mobile carrier, that receives public subsidies, will provide the same level of service as the incumbent wire line telephone company, to the extent consistent with wireless service and technology.

By its very nature, a wireless carrier that requires ETC funding to serve a rural area will not face significant competition for local service – if the area could be served economically, high cost funding would not be necessary or available. If there are competitive alternatives, and only one carrier receives public subsidies, the competitive landscape would be distorted. Both the integrity and the purpose of the universal fund would be undermined if carriers that can provide service without subsidies obtained public funds. The proposed rules apply to those carriers that receive public subsidies, and arguments based on conditions in which public subsidies are unnecessary or inappropriate are not pertinent.

Sprint Nextel witness Taylor further suggests that competition in the wireless industry is robust and that service quality standards are subject to market discipline. One of the key purposes of the USF is to enable local service providers to install their networks into areas that are not economically attractive absent USF funds. Staff Ex. 1.0 at 3. Even if the Commission accepts that there is competition among wireless carriers,

that has not resulted in wireless carriers providing a “basic level of service that customers expect when they purchase local exchange service, from any provider” in high cost rural areas. Id. at 5.

As Mr. McClerren pointed out: “Contrary to Ms. Taylor’s assertions that the wireless industry is a competitive industry under constant pressure to satisfy customers, the Illinois wireless industry has more than its share of customer complaints. The Illinois Attorney General’s Top 10 Consumer Complaint List released on January 29, 2007, shows the wireless industry as one of its most troubled sectors.” Staff Ex. 2.0 at 4.⁷ The problems that consumers have reported to the Office of the Attorney General may not include complaints that are reported to the FCC and to the ICC. Consumer protection rules can eliminate consumer complaints and frustration by establishing a level of service quality and consumer protection applicable to wireless carriers that take universal service subsidies that is equivalent to wire line service.

VIII. Conclusion

For the foregoing reasons, the People of the State of Illinois request that the Commission adopt Part 736 in its entirety and consistent with the testimony present in this docket.

Respectfully submitted,

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⁷ http://www.illinoisattorneygeneral.gov/pressroom/2007_01/20070129

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